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September 15, 2023

Via CM/ECF

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, N.W.
Washington, D.C. 20439

RE: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
CA No. 1:17-mc-00151-LPS

Dear Judge Stark:

We represent Refineria di Korsou N.V. (“RDK”) and write to provide an update to RDK’s Attached Judgment Statement [D.I. # 662] dated August 14, 2023 (the “RDK Statement”). As set forth in the RDK Statement, Petroleos de Venezuela, S.A. (“PDVSA”) moved in the Superior Court of Delaware (the “Superior Court”), C.A. No. N23J-01330, to quash the writ of attachment that RDK had previously obtained on PDVSA’s shares in PDV Holding, Inc. A hearing on the motion to quash was held in the Superior Court on September 8, 2023. At the conclusion of the hearing, the Court granted the motion to quash pursuant to *Deng v. HK Xu Ding Co.*, No. N21J-04630-AML, 2023 WL 3318322 (Del. Super. Ct. May 8, 2023), *appeal docketed*, No. 200, 2023 (Del. June 7, 2023), since the Court concluded that PDVSA’s shares of PDV Holding, Inc. were certificated and thus had to be physically seized for the writ to be valid even though there is not currently a physical share certificate. The Superior Court subsequently issued an order granting PDVSA’s motion to quash the writ and staying the action pending the outcome of PDVSA’s motion to vacate RDK’s judgment against PDVSA in the United States District Court for the Southern District of New York. A true and correct copy of the order is attached hereto as Exhibit A. RDK intends to file a motion for reconsideration of the Superior Court’s September 8, 2023 order.

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RDK will notify the Court and the Special Master of further developments that require updates of the RDK Statement.

Respectfully,

/s/ Margaret F. England

Margaret F. England (No. 4248)

cc: All counsel of record (via CM/ECF)